

ORIGINAL

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Attorney for Defendant  
 DEREK AHSUI

FILED IN THE  
 UNITED STATES DISTRICT COURT  
 DISTRICT OF HAWAII

JAN 24 2006

at 1 o'clock and 30 min. M  
 SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 05-00325-07 HG
	)	
vs.	)	NOTICE OF MOTION; MOTION FOR
	)	PRETRIAL RELEASE;
DEREK AHSUI,	(07)	DECLARATION OF COUNSEL;
	)	EXHIBIT "A"; CERTIFICATE OF
Defendant.	)	SERVICE
	)	
	)	Date: January __, 2006
	)	Time: ____ .m.
	)	Judge: Leslie E. Kobayashi

NOTICE OF MOTION

TO: Chris A. Thomas  
 Assistant U.S. Attorney  
 PJKK Federal Building  
 300 Ala Moana Blvd., Room 6100  
 Honolulu, Hawaii 96813  
 Attorney for Plaintiff  
 UNITED STATES OF AMERICA

PLEASE TAKE NOTICE that the following motion will be heard before the  
 Honorable Leslie E. Kobayashi, in her courtroom in the United States Courthouse, 300  
 Ala Moana Boulevard, Honolulu, Hawaii 96813 at \_\_\_\_ .m.. on \_\_\_\_\_, January, 2006.

SCANNED

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DEREK AHSUI

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 05-00325-07 HG
	)	
vs.	)	MOTION FOR PRETRIAL RELEASE
	)	
DEREK AHSUI,	(07)	)
	)	
Defendant.	)	
	)	

**MOTION FOR PRETRIAL RELEASE**

Defendant, DEREK AHSUI, by and through undersigned counsel, Lane Y. Takahashi, hereby moves this Court for pretrial release to the Big Island Substance Abuse Council (hereinafter "BISAC").

This motion is based Rules 12 and 47 of the Federal Rules of Penal Procedure, the records and files of this case, the attached declaration of counsel and Exhibit "A", and such evidence as may be presented at the hearing on this motion.

Dated: Honolulu, Hawaii, January 24, 2006.

  
\_\_\_\_\_  
LANE Y. TAKAHASHI  
Attorney for Defendant